

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 3 50 California Street, 22nd Floor
 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Kevin P.B. Johnson (Bar No. 177129)
 6 kevinjohnson@quinnemanuel.com
 Victoria F. Maroulis (Bar No. 202603)
 7 victoriamaroulis@quinnemanuel.com
 8 555 Twin Dolphin Drive, 5th Floor
 Redwood Shores, California 94065-2139
 Telephone: (650) 801-5000
 9 Facsimile: (650) 801-5100

10 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Michael T. Zeller (Bar No. 196417)
 11 michaelzeller@quinnemanuel.com
 12 865 S. Figueroa St., 10th Floor
 Los Angeles, California 90017
 Telephone: (213) 443-3000
 13 Facsimile: (213) 443-3100

14 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 15 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 16

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 19

20 APPLE INC., a California corporation,
 21 Plaintiff,
 22 vs.
 23 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 24 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 25 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 26 Defendant.
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CASE NO. 11-cv-01846-LHK
**DECLARATION OF MELISSA N. CHAN
 IN SUPPORT OF STIPULATION AND
 [PROPOSED] ORDER EXTENDING
 DEADLINE FOR DEPOSITIONS OF
 INVENTORS OF APPLE'S PATENTS
 PURSUANT TO CIVIL L.R. 6-2(a)**
 Trial Date: July 30, 2012

1 I, Melissa N. Chan, declare as follows:

2 1. I am an associate with the law firm of Quinn Emanuel Urquhart & Sullivan LLP
3 and counsel for defendants and counter-claimants Samsung Electronics Co. Ltd., Samsung
4 Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively,
5 “Samsung”). I submit this declaration in support of the parties’ stipulation and proposed order
6 extending the deadline for the depositions of several of the inventors of Apple’s patents, pursuant
7 to Civil L.R. 6-2. I am personally familiar with and knowledgeable about the facts stated in this
8 declaration and if called upon could and would testify competently as to the statements made
9 herein.

10 2. On July 1, 2011, plaintiff Apple Inc. (“Apple”) filed a motion for an expedited trial
11 on its claims and for an early case management conference. *See* Dkt. No. 83. Samsung opposed
12 the motion. *See* Dkt. No. 111.

13 3. On August 24, 2011, the Court held a case management conference and denied
14 Apple’s motion for an expedited trial, but granted a modified, expedited trial schedule as to both
15 Apple’s claims and Samsung’s counterclaims.

16 4. On August 25, 2011, the Court entered a Minute Order and Case Management
17 Order. *See* Dkt. No. 187. The Court ordered that the depositions of the inventors and prosecuting
18 attorneys for Apple’s patents must be completed by November 1, 2011, and that the depositions of
19 the inventors and prosecuting attorneys for Samsung’s patents must be completed by December 1,
20 2011. The Court also set the jury trial date for July 30, 2012.

21 5. Since the Court’s Order, the parties have worked to schedule the depositions of
22 their respective inventors and prosecuting attorneys.

23 6. On October 1, 2011, Samsung filed a motion to compel Apple to schedule the
24 depositions of its inventors. *See* Dkt. No. 283. The Court granted that motion in part, ordering
25 that Apple provide a schedule for the outstanding inventor depositions by no later than October 6,
26 2011, and that the depositions of Apple’s inventors and prosecuting attorneys “shall be completed
27 as soon as possible and in any event no later than October 31, 2011, in compliance with the court’s
28 previously-established deadline.” Dkt. No. 292.

1 7. However, despite the parties' best efforts to schedule all of the remaining
2 depositions of Apple's inventors before November 1, 2011, the parties have not been able to
3 schedule the depositions of Jonathan Ive, Douglas Satzger, Shin Nishibori, and Christopher
4 Stringer before the November 1, 2011 deadline.

5 8. The parties have not previously modified the Court's August 25, 2011 Order setting
6 the briefing and hearing schedule for Apple's preliminary injunction motion.

7 9. The requested time modification should not have any effect on the remainder of the
8 schedule for this case.

9 I hereby declare under penalty of perjury under the laws of the United States that the
10 foregoing is true and correct.

11

12 DATED: October 18, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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14

By /s/ Melissa N. Chan

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Melissa N. Chan

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Attorneys for Defendants/Counter-Claimants

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SAMSUNG ELECTRONICS CO., LTD.,

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SAMSUNG ELECTRONICS AMERICA, INC.

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and SAMSUNG TELECOMMUNICATIONS

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AMERICA, LLC

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General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Melissa N. Chan has concurred in this filing.

/s/ Victoria Maroulis